



Intelligent Transportation
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FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Amendment of Sections 15.35 and 15.253 of the Commission's Rules Regarding Operation of Radar Systems Within the 76.0-77.0 GHz Band, ET Docket No. 11-90, RM-11555, ET Docket No. 10-28, Notice of Proposed Rulemaking, Reply Comments of the Intelligent Transportation Society of America

Dear Ms. Dortch:

The Intelligent Transportation Society of America ("ITS America") hereby submits its Reply Comments regarding the *Notice of Proposed Rulemaking*¹ in the above-captioned proceedings regarding amending Section 15.35 and 15.253 (47 C.F.R. § 15.35 and 15.253) of the Federal Communications Commission's ("FCC" or "Commission") Rules regarding operation of vehicle radar systems in the 76.0-77.0 GHz band. We are writing to express our support for the proposed changes to the Commission's Rules as these new vehicular technologies will improve the safety of the traveling public by reducing the number of vehicle collisions and contribute to driver convenience.

Established in 1991, ITS America is the leading advocate for the deployment and development of communications and other advanced technologies that improve the safety, security and efficiency of the nation's surface transportation system. Its members include private corporations, public agencies, and academic institutions involved in the research, design, development and deployment of Intelligent Transportation Systems (ITS) that enhance safety, increase mobility and sustain the environment.

ITS America recognizes that one of the few ways to reduce the more than 33,000 traffic fatalities per year on our roads is to not only make cars better at withstanding crashes, but by adding technology that allows cars to avoid crashes altogether. Making it easier for automobile manufacturers and their suppliers to implement "intelligent" crash avoidance technologies, such

¹ *Amendment of Sections 15.35 and 15.253 of the Commission's Rules Regarding Operation of Radar Systems in the 76-77 GHz Band*, ET Docket No. 11-90, RM-11555, *Amendment of Section 15.253 of the Commission's Rules to Permit Fixed Use of Radar in the 76-77 GHz Band*, ET Docket No. 10-28, Notice of Proposed Rulemaking, 26 FCC Rcd 8107 (2011) ("Notice of Rulemaking").

as the enhanced vehicle radars in the 76-77 GHz band, has been a priority of ITS America since its inception. ITS America previously submitted Reply Comments in support of Toyota Motor Corporation's ("Toyota") 2009 *Petition for Rulemaking*,² which is the basis of the present *Notice of Rulemaking*.³

We recognize and support the comments of ITS America members Toyota, Denso Corporation ("Denso"), Volvo Trucks North America ("Volvo"), and Delphi Corporation ("Delphi"). Consistent with these commenters, we believe that Section 15.253 should be revised in light of international standards and previous actions by foreign regulatory bodies concerning these types of vehicle radar devices. As noted by Delphi, common radar emission standards worldwide will simplify design of radar systems. The market for automobiles is international in scope, and consistent US and foreign regulatory rules regarding vehicle radar devices in the 76-77 GHz band would be of benefit to the automotive industry by lowering the cost of advanced pre-crash safety systems. For the same reason, we also do not support National Radio Astronomy Observatory's ("NRAO") recommendation to create coordination zones by incorporating GPS into automotive radar, as this will increase the cost and complexity of radar systems with very little corresponding benefit in terms of reducing the potential for reduced interference.

We also support Toyota's and Delphi's comments regarding unlicensed fixed use of radars. ITS America also does not believe that allowing fixed radar applications on an unlicensed basis and regardless of location is desirable at this time. We also believe that the Commission should wait to see the results of the European Commission's MOSARIM ("More Safety for All by Radar Interference Mitigation") study that will be completed by the end of next year, which should provide a better technical understanding of the risks of inter-radar interference.

Finally, we agree with Toyota, Delphi, and Denso in support of the proposed changes to the applicable radiated power limits for these vehicular radar technologies.⁴

Respectfully submitted,
Intelligent Transportation Society of America



Joerg "Nu" Rosenbohm
Chief Technology Officer

² Toyota Motor North America, "Amendment of Section 15.253 of the Commission's Rules Regarding Operation within the 76.0-77.0 GHz Band (Vehicle Radar Systems)", *Petition for Rulemaking*, RM-11555 (Filed July 21, 2009) ("*Petition for Rulemaking*").

³ See *Reply Comments of Intelligent Transportation Society of America*, RM-11555 (October 13, 2009).

⁴ *Notice of Rulemaking*, ¶ 12.